

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONOS, INC.,
Plaintiff

No. 6:20-cv-881-ADA

v.

GOOGLE LLC,
Defendant

**DECLARATION OF JORDAN R. JAFFE IN SUPPORT OF GOOGLE LLC'S REPLY
CLAIM CONSTRUCTION BRIEF AND IN SUPPORT OF DR. KYRIAKAKIS'
DECLARATION IN SUPPORT OF GOOGLE LLC'S RESPONSIVE CLAIM
CONSTRUCTION BRIEF**

I, Jordan R. Jaffe, declare as follows:

1. I am an attorney at Quinn Emanuel Urquhart & Sullivan, LLP and am counsel for Defendant Google, LLC in this action. I am a member of the bar of the State of California and admitted *pro hac vice* in this action. I have personal knowledge of the facts set forth in this declaration, and if called as a witness I would testify competently to those facts.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Bose Lifestyle 50 System ("Bose Lifestyle") Invalidity Claim Chart for U.S. Patent No. 9,344,206 ("the '206 patent"), dated March 5, 2021.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the Sonos Digital Music System ("Sonos System") Invalidity Claim Chart for U.S. Patent No. 9,344,206 ("the '206 patent"), dated March 5, 2021.

4. Attached hereto as **Exhibit 3** is a true and correct copy of U.S. Patent No. 8,050,652, produced in this action as GOOG-SONOS-WDTX-INV-00004943.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a U.S. Patent Pub. No. 2005/251,566 produced in this action as GOOG-SONOS-WDTX-INV-00006608.

6. Attached hereto as **Exhibit 5** is a true and correct copy of U.S. Patent Pub. No. 2011/0131520, produced in this action as GOOG-SONOS-WDTX-INV-00007604.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the *Inter Partes Review* petition filed by Sonos in *Sonos, Inc. v. Black Hills Media LLC* (IPR2015-00590), dated January 21, 2015.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the article “*Control YouTube on the desktop, or the TV... with the YouTube Remote app for your phone,*” by Kuan Yong, Senior Product Manager, dated November 9, 2010 (available at <https://youtube.googleblog.com/2010/11/control-youtube-on-desktop-or-tv-with.html>).

9. Attached hereto as **Exhibit 8** is a true and correct copy of the relevant excerpts of dictionary definitions for the term “cloud.”

10. Attached hereto as **Exhibit 9** is a true and correct copy of the relevant excerpts of dictionary definitions for the term “multimedia.”

11. Attached hereto as **Exhibit 10** is a true and correct copy of the Declaration of Kevin C. Almeroth Ph.D. in the *Inter Partes Review* of U.S. Patent No. 7,835,689, dated April 22, 2014.

12. Attached hereto as **Exhibit 11** is a true and correct copy of Dr. Kyriakakis’ declaration in support of Google’s Reply Claim Construction Brief.

13. Attached hereto as **Exhibit 12** is a true and correct copy of a Letter dated 2021.04.16 from P. Anschutz to the Court.

14. Attached hereto as **Exhibit 13** is a true and correct copy of the relevant excerpts of dictionary definitions for the term “data”.

15. Attached hereto as **Exhibit 14** is a true and correct copy of the Staff's Initial Markman Brief in ITC Investigation No. 337-TA-1191, dated July 13, 2020.

16. Attached hereto as **Exhibit 15** is a true and correct copy of U.S. Patent No. 6,081,907, filed on June 9, 1997, and entitled “Data Delivery System And Method For Delivering Data and Redundant Information Over A Unidirectional Network.”

17. Attached hereto as **Exhibit 16** is a true and correct copy of a document produced in this action as SONOS-SVG2-00001898-916.

18. Attached hereto as **Exhibit 17** is a true and correct copy of a document produced in this action as SONOS-SVG2-00001275-93.

19. Attached as Kyriakis **Exhibit C** is a true and correct copy of an IEEE 802.11 November 2003 Plenary presentation by Jonn Martell, Wireless Project and Service Manager University of British Columbia, titled “*Deploying the World’s Largest Campus IEEE 802.11b Network,*” dated November 11th 2003.

20. Attached as Kyriakakis **Exhibit D** is a true and correct copy of the relevant excerpts of dictionary definitions for the term “data”.

21. Attached as Kyriakakis **Exhibit E** is a true and correct copy of U.S. Patent Publication No. 2003/0087636.

22. Attached as Kyriakakis **Exhibit F** is a true and correct copy of U.S. Patent No. 6,829,603.

23. Attached as Kyriakakis **Exhibit G** is a true and correct copy of the relevant excerpts of definitions for the term “packets”.

24. Attached as Kyriakakis **Exhibit H** is a true and correct copy of the relevant excerpts of dictionary definitions for the term “local area network”.

25. Attached as Kyriakakis **Exhibit I** is a true and correct copy of the IEEE Standard 802-2001, *IEEE Standard for Local and Metropolitan Area Networks: Overview and Architecture*, dated February 7, 2002.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 1st day of June, 2021 in San Francisco, California.

Respectfully submitted,

By: /s/ Jordan R. Jaffe
Jordan R. Jaffe